

EXHIBIT 163

From: Brantley, Eric
Sent: Tuesday, February 25, 2014 8:18 AM
To: Hernandez, Tracey
Subject: charter
Attachments: Charter.docx

Tracey,

Attached is the charter I will distribute to the board members today.

Eric Brantley
Manager, Customer Due Diligence & SOM
130 Vintage Dr. Huntsville, AL 35811
256-799-7848 direct
ebrantley@qualitestrx.com



.....
endo | AMS Endo Pharmaceuticals Qualitest

This e-mail transmission may contain confidential or legally privileged information that is intended only for the individual(s) or entity(ies) named in the e-mail address. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or reliance upon the contents of this e-mail is strictly prohibited. If you have received this e-mail transmission in error, please notify the sender immediately so that Qualitest can arrange for proper delivery, and then please delete the message from your system. Thank you.

CHARTER FOR THE ADVISORY BOARD OF QUALITEST PHARMACEUTICALS SUSPICIOUS ORDER MONITORING (SOM) PROGRAM

PURPOSE:

The purpose of the Qualitest Pharmaceuticals (the "Company") Suspicious Order Monitoring Program Advisory Board (the "Advisory Board") established pursuant to this charter is to review (SOM) matters brought to the Board by the organization and to recommend appropriate actions.

MEMBERSHIP:

The Advisory Board shall consist of the Director DEA Compliance, Vice President Legal, and Deputy Compliance Officer – Generics.

MEETINGS:

Meetings of the Advisory Board may be held at such time and place as shall from time to time be determined by the Advisory Board. The Advisory Board shall convene as business need dictates with Quarterly Executive Summaries provided to the Advisory Board, regardless of meeting frequency. Executive Summaries may include but are not limited to:

- Number and names of customers denied the ability to purchase Controlled Substances.
- Number of pended orders for Controlled Substances that were rejected, including customer name and DEA#.
- List of non-conforming customers and a description of the areas for improvement.
- List of customers reported to the Drug Enforcement Administration (DEA).

The Advisory Board may ask other members of the organization to attend the meeting and provide pertinent information as necessary.

GENERAL ADVISORY BOARD RESPONSIBILITIES:

The general responsibilities and duties of the Advisory Board include:

1. Review recommendations from SOM Team regarding corrective actions concerning tier 1 customers who are not in compliance with Qualitest SOM policies. A tier 1 customer is a customer with a minimum of ten million dollars in overall sales and/or 750,000 dosage units of Controlled Substance or List 1 chemical purchases annually. The Qualitest Chief Operating Officer (COO) will have final authority in determining Controlled Substance discontinuance to a tier 1 customer.
2. Review tier 1 customer orders identified by SOM Team as suspicious and determine course of action.
3. Review matters brought to Advisory Board by SOM Team and provide guidance.

The Advisory Board or COO may direct the SOM Team to perform further due diligence such as site-visits, additional data requests from customers, etc. The Advisory Board or COO may direct other action(s) concerning customers that based on the available information, do not appear to be engaged in diversion. After members of the Advisory Board have had an opportunity to discuss the background on a tier 1 customer in question, the evaluation will be presented to the COO for final decision using a Tier 1 Customer Evaluation Sheet.

SOM ACTIVITIES INCLUDE:

Approval to Receive Controlled Substances

1. New and existing retail (tier 3) customer approval for controlled substance purchases. A tier 3 customer is a retail independent pharmacy.
 - i. Customer completes questionnaire and submits along with a 12 month dispensing history for all prescription drugs including Controlled Substances. The state of Georgia has restrictions against asking pharmacies in the state for dispensing histories.
 - ii. This data is reviewed to determine the percentage of Controlled Substances dispensed, percentage of prescriptions paid in cash, average number of prescriptions filled each month and the process used to verify prescriptions.
 - iii. A license verification is completed on the pharmacy and Pharmacist in Charge (PIC), and an internet search is conducted on the owner, PIC, and the pharmacy name.
 - a. Approvals of new Controlled Substance customers or the addition of Controlled Substance purchase authority to an existing customer profile must be approved by the SOM Team. Advisory Board approval not required unless there is an unresolved conflict with Sales Team.
2. New and existing wholesaler/chain (tier 2) customer approval for controlled substance purchases. A tier 2 customer is a customer that does not meet the requirements of a tier 1 customer and is not a retail pharmacy.
 - i. Customer submits completed questionnaire. A license verification is completed along with internet search on the company and ownership. Customer's SOM program is reviewed.
 - a. Approvals by SOM Team. Advisory Board approval not required unless there is an unresolved conflict with Sales Team.
3. New and existing wholesaler/chain (tier 1) customer approval for controlled substance purchases.
 - i. Customer submits completed questionnaire. An internet search is conducted on company and ownership. Company's SOM program is reviewed.
 - a. Approvals by SOM Team. Advisory Board and COO approval required to deny tier 1 customer.

Held Order Review and Rejection

1. Tier 2 & 3 customer held order review and rejection.
 - i. Boundaries are reviewed along with 12 month purchase history. Customer is contacted if additional information is required.
 - a. Order rejections by SOM Team. Advisory Board approval not required unless there is an unresolved conflict with Sales Team.
2. Tier 1 customer held order review and rejection.
 - i. Boundaries are reviewed along with 12 month purchase history and order pattern. Customer is contacted if additional information is required.
 - a. Approvals by SOM team. Advisory Board approval required for rejected orders.

Discontinue Shipments to Customers

1. Discontinue shipments of Controlled Substances to tier 2 & 3 customers.
 - i. Decision made by SOM Team. Advisory Board approval is not required unless there is an unresolved conflict with Sales Team.
2. Discontinue shipments of Controlled Substances to tier 1 customers.
 - a. Advisory Board and COO approval required.

Set Boundaries for all Customers.

1. All boundaries set by SOM Team.

MINUTES:

The Advisory Board will maintain written minutes of its meetings.